

# EXHIBIT A



Court's Address and Phone Number:  
Camden Special Civil Part  
101 South Fifth Street  
Camden, NJ, 08103

Telephone No. (856) 379-2200

RECEIVED  
Superior Court of New Jersey  
Law Division, Special Civil Part  
Camden County  
Docket No: DC -001439-16  
CIVIL DIVISION  
MAILROOM  
Civil Action  
**SUMMONS**  
Check one ☐ Contract ☐ Tort

### YOU ARE BEING SUED!

#### Person or Business Suing You (Plaintiff)

Kissie Stafford

( ) Cash (X) Check  
( ) Money Order  
Fee paid in full

(See the following page(s) for additional plaintiffs) FEB 19 2016 # 1880

#### Plaintiff's Attorney Information

Yaakov Saks-RC Law Group PLLC  
285 Passaic Street  
Hackensack, NJ, 07601

Amount \$ 82  
Batch # 763

#### Person or Business Being Sued (Defendant)

Quality Asset Recovery  
7 Foster Ave, Suite 101  
Gibbsboro, NJ, 08026

(See the following page(s) for additional defendants)

#### The Person or Business Suing You Claims You Owe the Following:

Demand Amount	\$ 10,000.00
Filing Fee	\$ 75.00
Service Fee	\$ 7.00
Attorney's Fees	\$
<b>TOTAL</b>	<b>\$ 10,082.00</b>

### FOR JUDICIARY USE ONLY

In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.

**IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE 04/04/2016, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:**

- Answer the complaint.** An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Clerk's Offices or on the Judiciary's Internet site [www.njcourts.com](http://www.njcourts.com) under the section for forms. If you decide to file an answer to the complaint made against you:
  - Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: **Treasurer, State of New Jersey**. Include DC -001439-16 (your Docket Number) on the check.
  - Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.
  - Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This MUST be done at the same time you file your Answer with the court on or before 04/04/2016.
- Resolve the dispute.** Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the SIGNED agreement to the court's address listed above on or before 04/04/2016.

**Please Note - You may wish to get an attorney to represent you.** If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at 856-964-2010. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at 856-482-0618. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.

/s/ Name Nalo Brown  
Acting Deputy Clerk of the Superior Court





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Superior Court of New Jersey  
Law Division, Special Civil Part

Camden \_\_\_\_\_ County

Docket No: DC: **-001439-16**

Civil Action

**SUMMONS**Check one ☐ Contract ☐ Tort**Additional Plaintiffs/demandantes adicionales****Additional Defendants/demandados adicionales**

FILED Feb 22, 2016

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION SPECIAL CIVIL PART  
CAMDEN COUNTY**

-----X  
Kissie Stafford

Plaintiff,

Docket No: DC-001439-16

**COMPLAINT**

-v.-

Quality Asset Recovery

Defendant.  
-----X

Plaintiff Kissie Stafford ("Plaintiff" or "Stafford") by and through her attorneys, RC Law Group, PLLC, as and for its Complaint against Defendant Quality Asset Recovery ("Defendant" or "QAR") respectfully sets forth, complains and alleges, upon information and belief, the following:

**INTRODUCTION/PRELIMINARY STATEMENT**

1. Plaintiff brings this action for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of section 1692 et. seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA").

**PARTIES**

2. Plaintiff is a resident of the State of New Jersey, County of Mercer.

3. Defendant is a debt collector with an address in Camden County, at 7 Foster Ave., Suite 101, Gibbsboro, NJ 08026.

4. Quality Asset Recovery is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA.

### **JURISDICTION AND VENUE**

5. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as well as 15 U.S.C. § 1692 et. seq. and 28 U.S.C. § 2201. If applicable, the Court also has pendant jurisdiction over the State law claims in this action pursuant to 28 U.S.C. § 1367(a).

6. Venue is proper in this judicial district pursuant under N.J.S.A. 6:1-3(a), because the acts and transactions occurred here, and Defendants transact business here.

### **FACTUAL ALLEGATIONS**

7. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully state herein with the same force and effect as if the same were set forth at length herein.

8. On information and belief, on a date better known to Defendant, Defendant began collection activities on an alleged consumer debt from the Plaintiff ("Alleged Debt").

9. This debt was incurred as a financial obligation that was primarily for personal, family or household purposes and is therefore a "debt" as that term is defined by 15 U.S.C. § 1692a(5).

10. The reporting of a debt to a credit reporting agency by a debt collector is a communication covered by the FDCPA.



11. Defendant reported the Alleged Debt on the Plaintiff's credit report.

12. Plaintiff disputed the Alleged Debt directly with the Defendant with a dispute letter on October 15, 2015.

13. Plaintiff examined her credit report again on December 8, 2015 and found that Defendant had not removed the credit account nor marked it as "disputed by consumer" despite being required to do so by the FDCPA.

14. As a result of Defendant's deceptive, misleading and unfair debt collection practices, Plaintiff has been damaged.

**FIRST CAUSE OF ACTION**  
**(Violations of the FDCPA)**

15. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully state herein with the same force and effect as if the same were set forth at length herein.

16. Defendant's debt collection efforts attempted and/or directed towards Plaintiff violate various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692d, 1692e(2), 1692e(5), 1692e(8), and 1692f.

17. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged and is entitled to damages in accordance with the FDCPA.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff Kissie Stafford demands judgment from the Defendant Quality Asset Recovery, as follows:

- a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1);
- b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3);
- d) A declaration that the Defendants practices violated the FDCPA; and
- e) For any such other and further relief, as well as further costs, expenses and disbursements of this action as this Court may deem just and proper.

Dated: Hackensack, New Jersey  
February 10, 2016

  
\_\_\_\_\_  
**RC Law Group, PLLC**

By: Yankov Saks, Esq.  
285 Passaic Street  
Hackensack, NJ 07601  
Phone: 201.282.6500 ext. 201  
Fax: 201.282.6501



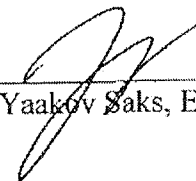
### Rule 4:51-1 Certification

The undersigned attorney for the plaintiff certifies that the matter in controversy is not the subject of any other action pending in any Court or a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I certify that confidential person identifies have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7b.

#### **Certification**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 2/10/2016

Signature:   
Yaakov Saks, Esq.